Robert A. Higgins & Associates P.C. 8200 Camp Bowie West Fort Worth, TX 76116

Telephone: (817) 924-9000 Facsimile: (866) 372-5229

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

IN RE:

CASE NO.: 15-41378-MXM-13

MYRNA ASIS ROZENBURG

Chapter: 13

Debtor(s)

## **MOTION TO REOPEN CASE**

## NOTICE OF HEARING

NO HEARING WILL BE CONDUCTED HEREON IF THE COURT DETERMINES THAT NO PARTY IN INTEREST HAS STANDING TO OPPOSE THIS MOTION.

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT 501 WEST TENTH STREET, FORT WORTH, TEXAS 76102, BEFORE 4:00 P.M. AND BEFORE THE EXPIRATION OF **TWENTY-FOUR (24) DAYS** FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE MUST BE IN WRITING AND FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING WILL BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT.

COMES NOW Myrna Asis Rozenburg (hereinafter referred to as "Debtor" whether singular or plural), and files this Motion to Voluntarily Dismiss Case, and in support thereof would respectfully show the Court as follows:

- 1. Debtor filed a Voluntary Petition for Relief under Chapter 13 of Title 11 of the United States Code on or about April 6, 2015.
  - 2. The Debtor received a discharge in this case by order entered on May 1, 2020.
- 3. The Debtor files this motion pursuant to 11 U.S.C. §350(b) to accord relief to the Debtor as the Debtor needs to file an adversary proceeding to enforce the discharge injunction.

WHEREFORE, Debtor prays that this case be reopened.

Respectfully submitted,

/s/ Jim Morrison

JIM MORRISON
Texas Bar No. 14519050
Robert A. Higgins & Associates P.C.
8200 Camp Bowie West
Fort Worth, TX 76116
Telephone: (817) 924,9000

Telephone: (817) 924-9000 Facsimile: (866) 372-5229

E-mail: jim.morrison@higginslaw.com

Attorney for Debtor(s)

## **CERTIFICATE OF SERVICE**

I certify that a true copy of the attached "Motion to Reopen Case" was served upon all parties per attached mailing matrix by means stated below on April 15, 2021.

/s/ Jim Morrison

JIM MORRISON

Texas Bar No. 14519050